

DECA Enforcement Plan for Making a Difference in Communities FY 2015

[Linkages to the Newark Sustainability Action Plan (NSAP) or the Camden Collaborative Initiative (CCI) are indicated in blue]

For all communities, DECA will pursue SEPs to benefit the community, where appropriate

Newark

WCB:

- Track existing CSO Order with the City of Newark and assure compliance [NSAP Stormwater Management and Community Greening Action Item 2, Pg. 72]
- Work with DOJ to successfully resolve PVSC case which may ultimately reduce CSO discharges to Newark [NSAP Stormwater Management and Community Greening Action Item 2, Pg. 72]
- Track existing SDWA Order with the Newark Water Department and assure compliance
- Provide support to the State concerning the requirements of the SDWA regarding Newark's uncovered finished drinking water reservoir
- Work with the Newark School District to get the current picture of their lead in schools drinking water program to assure that guidance is still being followed
- Perform an MS4 audit and stormwater Multi-Sector General Permit inspections in Newark (we are requesting contractor funds to perform these inspections) [NSAP Stormwater Management and Community Greening Action Item 2, Pg. 72]

ACB:

- We are working with the Port Authority of NY/NJ and the three terminals in Newark to reach enforceable agreements to help address the Ironbound community's concern of truck idling [NSAP Air Quality Action Item 2, Pg. 14]
- Develop and implement an enforcement strategy regarding the Area Source Boiler MACT, including a Regional enforcement alert, and targeted inspections/ enforcement follow-up in Newark and Camden, NJ (we are requesting support from OECA for this) [NSAP Air Quality Action Item 5, Pg. 25]
- Perform CAA inspections in targeted sectors, if targets are available [NSAP Air Quality Action Item 4, Pg. 23]

RCB:

- Perform targeted underground storage tank (UST) inspections, if targets are available
- Perform targeted hazardous waste inspections, especially in flood zones (LQGs, TSDFs) if targets are available

PTSB:

- Previously conducted Integrated Pest Management (IPM) activities for the Newark School System
- Previously conducted outreach regarding PCBs in schools

- Will investigate universe of pesticide establishments and PCB handlers, for potential inspection targets
- Will investigate the facilities in TRI that are subject to filing for potential under/miss-reporting violations
- OEI may provide funding to generate a "TRI Community Snapshot" interactive factsheet for Newark
- Will provide outreach regarding bed bugs, lead based paint hazards, and pesticides

CAPSB:

- Mapped, using GeoPlatform, the federally-regulated facilities in Newark located in the FEMA 100-year flood zone for the oil, hazardous waste, storm water and emergency planning and community right-to-know programs
- Conducted 20 multi-media inspections inside the flood zone [NSAP Stormwater Management and Community Greening Action Item 2, Pg. 72]
- We are currently evaluating our inspection findings to determine the appropriate enforcement follow-up to the potential compliance concerns identified during the multi-media inspections of Newark facilities in flood-prone areas. We plan to also recommend additional steps the facilities could take to go beyond compliance to reduce their environmental impact on the surrounding community during an extreme storm event
- EJ Small Grant Program grants were awarded to:
 - GreenFaith (2009) for air monitoring at Port Newark
 - Ironbound Community Corporation (2011) to create a community learning garden
 - Ironbound Community Corporation (2013) to educate residents on reducing toxic substances in soils

Camden

WCB:

[All of the following falls under the CCI, Goal "Minimize flooding and volume of CSOs to the rivers, improve drinking, and waste water infrastructure to minimize water loss, environmental impact water quality"]

- Track existing CSO Order with the Camden County Municipal Utilities Authority to assure compliance
- Track the Administrative Compliance Order for the City of Camden Municipal Separate Storm Sewer System (MS4)
- Work with the Camden School District to get the current picture of their lead in schools drinking water program to assure that guidance is still being followed
- Complete a PWS drinking water sanitary survey
- Perform stormwater Multi-Sector General Permit inspections (we asked for OECA contractor assistance for these inspections)

ACB:

[All of the following falls under the CCI, Goal "Improve air quality. Encourage existing businesses and industries to adopt practices to minimize air impacts"]

- Develop and implement an enforcement strategy regarding the Area Source Boiler MACT, including a Regional enforcement alert, and targeted inspections/ enforcement follow-up in Newark and Camden, NJ (we are requesting support from OECA for this)
- Perform CAA inspections in targeted sectors, if targets are available

RCB:

- In FY 14, issued 3 field citations for underground storage tank (UST) violations:
 - Camden City Fire Department
 - City of Camden BOE warehouse
 - Broadway & Liberty Fire Station
- Perform targeted UST inspections, if targets are available
- Perform targeted hazardous waste inspections, if targets are available
- Perform LQG and TSD inspections in flood zones, if targets are available

PTSB:

- Previously conducted outreach regarding PCBs in schools
- Will work with the Camden School District to incorporate Integrated Pest Management (IPM) activities in their schools (*currently underway*)
- Will investigate universe of pesticide establishments and PCB handlers, for potential inspection targets
- Will investigate the facilities in TRI that are subject to filing for potential under/miss-reporting violations
- Will provide outreach regarding bed bugs, lead based paint hazards, and pesticides

CAPSB:

- An EJ Small Grant Program grant was awarded to Hearts of Camden (2009) to study and identify the environmental and public health issues in Camden City, NJ. Specifically, they will develop a comprehensive environmental health information tool [CCI, Goal "Support the capacity of the residents, stakeholders, and City to improve environmental quality and address environmental justice. Incorporate outreach and education as integral component to achieve all CCI goals"]
- Using GeoPlatform, DECA assisted CASD with mapping ECHO federally regulated facilities and Dunn & Bradstreet businesses, within the FEMA 100 year flood zone layer for the oil, hazardous waste, storm water and emergency planning and community right-to-know programs. We will continue to map additional facilities
- Conduct inspections in flood-prone areas that are regulated under our hazardous waste (SQG, LQG, and TSDF), oil, storm water and emergency planning programs and distribute our "flood-resources" CD-ROM to these facilities. We will also in our follow-up letters recommend additional steps the facilities could take to go beyond compliance to reduce their environmental impact on the surrounding community during an extreme storm event (e.g. green infrastructure)

Newburgh

WCB:

- In FY 14 we completed lead in school drinking water testing at Newburgh public schools. The Washington Street School, which houses the universal pre-K classes, only had one exceedance. The resampling of the Newburgh Free Academy (Main Campus) had 5 outlets with levels greater

than 20 ppb. The school district now has all the results and are identifying and addressing the outlets which require attention. We are also working with the Head Start in Newburgh to test their schools.

- Follow-up (issue Administrative Order) on recent pre-treatment audit
- Perform a PWS sanitary survey (we will request NEIC assistance to complete this)
- Perform MS4 audit, SSO/CSO inspections and stormwater Multi-Sector General Permit inspections in Newburgh (*we have begun to coordinate with a contractor*)

ACB:

- Perform CAA inspections in targeted sectors, if targets are available

RCB:

- Perform targeted underground storage tank (UST) inspections, if targets are available
- Perform targeted hazardous waste inspections, if targets are available
- Perform LQG and TSD inspections in flood zones, if targets are available

PTSB:

- Previously conducted outreach regarding PCBs in schools
- Conducted two lead-based paint compliance inspection sweeps in FY 13:
 - 29 Lead-Based Paint Inspections completed (Notices of Inspection-NOIs-issued)
 - 14 NOIs issued to RRP contracting firms
 - 5 NOIs issued to RRP Training Providers
 - 3 NOIs issued to Abatement Firms
 - 7 NOIs to Property Managers (1018 Disclosure inspections)
 - 59 work site addresses visited (from open permit information)
 - Numerous Compliance Assistance Materials distributed
 - 8 Information Request Letters sent
- Will work with the school district to incorporate Integrated Pest Management (IPM) activities in their schools
- Will investigate universe of pesticide establishments and PCB handlers, for potential inspection targets
- Will investigate the facilities in TRI that are subject to filing for potential under/miss-reporting violations
- Will provide outreach regarding bed bugs, lead based paint hazards, and pesticides

Martin Pena

CWA:

- DECA will continue to provide technical support to DOJ and CEPD in the settlement and conclusion of the San Juan CWA MS4, the DNER, the DOT and the PRASA judicial cases

CAPSB:

- An EJ Small Grant Program grant was awarded to Leader for the World (2012) to raise awareness of the environmental and public health effects of improper solid waste disposal in the Cantera Peninsula of San Juan, Puerto Rico.